

July 5, 2005

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Regulatory Analysis and Development, PPD, APHIS
Station 3C71, 4700 River Road, Unit 118
Riverdale, MD 20737-1238

On behalf of the more than 2000 members of the Montana Stockgrowers Association we appreciate the opportunity to submit the following comments on the National Animal Identification System (NAIS) draft strategic plan developed by the USDA Animal and Plant Health Inspection Service. The need for, and benefit of, an efficient and cost effective individual animal identification system has never been more obvious. While there is little doubt an identification program will soon become a reality we must recognize that such a program will have a huge impact on the livestock industry. As such, it is imperative that the industry plays a key role in that implementation. In order to be effective this program must be accepted by all segments of the livestock industry. Obviously there are numerous barriers to acceptance and compliance. Those barriers must be eliminated or minimized to the greatest extent possible.

In general, there seems to be support within the industry for an ID program but our members are quite concerned with several key areas. The program must be flexible to meet the varied livestock operations that exist in Montana. It must be a program that can be implemented with minimal costs to all segments of the industry. The database used to store this important information must be developed and managed by a neutral, private, non-profit consortium. It should recognize and embrace existing programs that provide the require information. It should not expose producers to any additional liability or risks that do not exist today. And last, it must provide for confidentiality of the stored data and still allow access to state and federal animal health officials during times of animal disease outbreaks. Several of these issues will be address in further details below.

EXISTING PROGRAMS - For many years the movement of cattle in Montana has been regulated by an effective brand registration and animal inspection program. While brands obviously do not provide individual animal identification they may be valuable in a group or lot identification process. We fully realize that not all states have similar laws but the industry in Montana accepts and recognizes the role brands and brand inspection plays and we would like to see any national program recognize the hot iron bran as a method of identification for individual states as they see fit. We are currently cooperating with the Montana Department of Livestock, Montana State University and several other state livestock organizations on an animal identification pilot project to demonstrate how brands, combined with the Montana Beef Network which is an existing

program using RFID tags to track individual animals can facilitate an effective ID program.

CONFIDENTIALITY – Unauthorized access and improper use of stored data continues to be one of the greatest concerns within the industry. Whether real or perceived, producers have a concern that a government database will expose them to additional liability and risk. A database managed by a neutral, private, non-profit consortium would add an effective firewall to protect this information from Freedom of Information Act requests.

COSTS – While the first two phases of implementation of the NAIS should be accomplished with little direct cost to the industry, the implementation of phase three could prove very costly.

FLEXIBILITY – Montana has nearly 12,000 producers scattered throughout the state's 93 million topographically diverse acres. Those statistics become further complicated by the fact that Montana has more than 4,000 federal grazing allotments and 15 livestock auction markets. Montana needs as much flexibility as possible to meet the many varied situations that exist. As long as the required information is available to state and federal animal health officials, producers should be given as much latitude as possible.

We encourage you to seriously consider allowing the industry to develop and implement the national animal ID program. As discussed above, cost remains a serious barrier to compliance and by allowing industry involvement you will have a better chance of getting producer support and compliance.

Thank you again for the opportunity to provide these thoughts as you finalize the program.

Sincerely,

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